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19 *Michael Halprin*

20 **UNITED STATES DISTRICT COURT**
21 **DISTRICT OF NEVADA**

22 UNITED STATES OF AMERICA,
23
24 Plaintiff,

25 vs.

26 MICHAEL HALPRIN,
27
28 Defendant.

Case No.: 2:19-cr-00154-RFB-MDC

**JOINT STIPULATION TO CONTINUE
DEFENDANT HALPRIN'S SENTENCING
HEARING SCHEDULED FOR APRIL 25,
2024**

IT IS HEREBY STIPULATED AND AGREED by and between JASON FRIERSON,
United States Attorney, District of Nevada, and NADIA AHMED and JACOB OPERSKALSKI,
Assistant United States Attorneys, representing the United States of America, and LOUIS
PALAZZO, NATHAN GARRETT, and LUCINDA LUETKEMEYER, representing Defendant
Michael Halprin, that the sentencing hearing scheduled for April 25, 2024, at 8:30 a.m., in the

1 above-captioned matter, be vacated and continued to a date and time to be set by this Honorable
2 Court but no sooner than May 20, 2024.

3 This stipulation is entered into for the following reasons:

4 1. Sentencing in this matter is currently scheduled for April 25, 2024, at 8:30 a.m.

5 2. On February 15, 2024, counsel for co-defendant Eghomware Igbinovia, aka Jerry
6 Igbinovia, and the government jointly moved to continue the calendar call and trial date. The
7 calendar call is now scheduled for April 23, 2024, and trial is now scheduled for May 20, 2024.
8 Dkt. Nos. 391 and 392.

9 3. Defense counsel needs additional time to investigate issues relevant to sentencing and
10 prepare for sentencing.

11 4. Mr. Halprin has appeared in this case, and is not in custody and, along with the
12 government, agrees to this continuance.

13 5. The additional time requested herein is not sought for purposes of delay and the denial of
14 this request for a continuance could result in a miscarriage of justice.

15 6. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing
16 hearing for good cause. Good cause exists in this case.

17 7. Counsel for Defendant Michael Halprin and the government agree a continuance of the
18 sentencing hearing is in the best interests of justice.

19 8. For all the above-stated reasons, the ends of justice would be best served by the
20 continuance of the sentencing hearing.

21 This is the sixth request for a continuance of the sentencing hearing.
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1 DATED: March 8, 2024

2 By /s/ Nathan F. Garrett

3 GRAVES GARRETT, LLC

4 Nathan F. Garrett, *pro hac vice*

5 Lucinda H. Luetkemeyer, *pro hac vice*

6 PALAZZO LAW FIRM

7 A PROFESSIONAL LAW CORPORATION

8 T. Louis Palazzo, Esquire

9 *Counsel for Defendant Michael Halprin*

10 JASON FRIERSON

11 United States Attorney

12 By /s/ Nadia Ahmed

13 Nadia Ahmed

14 Assistant United States Attorney

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MICHAEL HALPRIN,

Defendant.

Case No.: 2:19-cr-00154-RFB-MDC

**JOINT STIPULATION TO CONTINUE
DEFENDANT HALPRIN'S SENTENCING
HEARING SCHEDULED FOR April 25,
2024**

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Sentencing in this matter is currently scheduled for April 25, 2024, at 8:30 a.m.
2. Defense counsel needs additional time to investigate issues relevant to sentencing and prepare for sentencing.
3. Mr. Halprin has appeared in this case, and is not in custody and, along with the government, agrees to this continuance.
4. The additional time requested herein is not sought for purposes of delay and the denial of this request for a continuance could result in a miscarriage of justice.
5. Federal Rule of Criminal Procedure 32(b)(2) permits this Court to continue a sentencing hearing for good cause. Good cause exists in this case.

For all of the above-stated reasons, the ends of justice would best be served by an order vacating the current sentencing hearing date and continuing the sentencing hearing date no sooner than May 20, 2024.

ORDER

IT IS HEREBY ORDERED that the sentencing hearing currently scheduled for April 25, 2024, at the hour of 8:30 a.m., be vacated and continued to **June 13, 2024 at 8:30 a.m.**

DATED March 11, 2024.

A handwritten signature in black ink, appearing to be 'RFB' with a stylized flourish extending to the right.

THE HONORABLE RICHARD F. BOULWARE
UNITED STATES DISTRICT JUDGE